

James O. Lattuner  
1 EDELMAN, COMBS, LATTURNER & GOODWIN, LLC  
120 South LaSalle Street, 18th Floor  
2 Chicago, Illinois 60603  
(312) 739-4200 (telephone)  
3 (312) 419-0379 (facsimile)  
jlattuner@edcombs.com  
4

Ethan Preston (263295)  
5 PRESTON LAW OFFICES  
21001 North Tatum Blvd., Suite 1630-430  
6 Phoenix, Arizona 85050  
(480) 269-9540 (telephone)  
7 (866) 509-1197 (facsimile)  
ep@eplaw.us  
8

Douglas J. Campion (75381)  
9 LAW OFFICES OF DOUGLAS J. CAMPION  
409 Camino Del Rio South, Suite 303  
10 San Diego, California 92108  
(619) 299-2091 (telephone)  
11 (619) 858-0034 (facsimile)  
doug@djcampion.com  
12

*Attorneys for Nationwide Plaintiffs*  
13

14 **IN THE UNITED STATES DISTRICT COURT FOR**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 IN RE PORTFOLIO RECOVERY  
ASSOCIATES, LLC, TELEPHONE  
17 CONSUMER PROTECTION ACT  
LITIGATION

No. 11-md-02295-JAH-BGS

Member cases:

3:10-cv-02658-JAH-BGS  
3:11-cv-01008-JAH-BGS  
3:11-cv-03006-JAH-BGS  
3:11-cv-03007-JAH-BGS  
3:11-cv-03057-JAH-BGS

Hon. John A. Houston  
Hon. Bernard G. Skomal

**PLAINTIFFS FRYDMAN, MARIN, JURY,  
MEYER, AND ALLEN'S *EX PARTE*  
APPLICATION FOR THE  
APPOINTMENT OF INTERIM  
LEADERSHIP STRUCTURE FOR  
PLAINTIFFS' COUNSEL**

1                   **PLAINTIFFS FRYDMAN, MARIN, JURY, MEYER, AND ALLEN'S *EX PARTE***  
2                   **APPLICATION FOR THE APPOINTMENT OF INTERIM LEADERSHIP**  
3                   **STRUCTURE FOR PLAINTIFFS' COUNSEL**

4                   Plaintiffs Jeremy Frydman, Sam Marin, Jesse Meyer, Fred Jury, and Danny Allen  
5                   ("Nationwide Plaintiffs") respectfully move the Court for an order appointing counsel for Jeremy  
6                   Frydman (James O. Lattuner of Edelman, Combs, Lattuner & Goodwin, LLC), and counsel for  
7                   Meyer (Ethan Mark Preston of Preston Law Offices) as interim co-lead counsel and counsel for  
8                   Allen (Doug Campion) as *liaison* counsel to the Court.

9                   Nationwide Plaintiffs assert that that the appointment of a leadership structure for class  
10                  counsel is necessary to achieve the coordination and efficiency contemplated by the Judicial  
11                  Panel for Multidistrict Litigation's Transfer Order (Dkt. No. 1). Nationwide Plaintiffs have  
12                  submitted the Application in advance of the February 10, 2012 case management conference so  
13                  that it can be discussed at the conference; Nationwide Plaintiffs contend that the most timely and  
14                  efficient opportunity to appoint an interim leadership structure is at the case management  
15                  conference.

16                  The Application is based upon the accompanying Memorandum of Points and  
17                  Authorities, the attached résumés, the complete file and records in this action, any oral argument  
18                  and other evidence presented at the hearing on this matter, evidence of which the Court may or  
19                  must take judicial notice, and any other evidence that the Court may wish to consider.

20                  Dated: January 27, 2012

21                  By: s/ Douglas J. Campion  
22                       Douglas J. Campion (75381)  
23                       LAW OFFICES OF DOUGLAS J. CAMPION  
24                       409 Camino Del Rio South, Suite 303  
25                       San Diego, California 92108  
26                       (619) 299-2091 (telephone)  
27                       (619) 858-0034 (facsimile)  
28                       doug@djcampion.com

                      Abbas Kazerounian (249203)  
                      KAZEROUNIAN LAW GROUP  
                      2700 North Main Street, Suite 1000  
                      Santa Ana, California 92866  
                      (800) 400-6808 (telephone)  
                      (800) 520-5523 (facsimile)  
                      ak@kazlg.com

                      Joshua Swigart (225557)  
                      HYDE & SWIGART

411 Camino Del Rio South, Suite 301  
San Diego, California 92108  
(619) 233-7770 (telephone)  
(619) 297-1022 (facsimile)  
josh@westcoastlitigation.com

Email: \_\_\_\_\_

*Attorneys for Plaintiff Danny Allen, Jr., on his own  
behalf, and behalf of all others similarly situated*

Dated: January 27, 2012

By: s/ James O. Lattuner  
Daniel A Edelman  
Cathleen M. Combs  
James O. Lattuner  
Cassandra P. Miller  
EDELMAN, COMBS, LATTURNER &  
GOODWIN, LLC  
120 South LaSalle Street, 18th Floor  
Chicago, Illinois 60603  
(312) 739-4200 (telephone)  
(312) 419-0379 (facsimile)  
dedelman@edcombs.com  
ccombs@edcombs.com  
jlattuner@edcombs.com  
cmiller@edcombs.com

Keith James Keogh  
Ainat Natalie Margalit  
Craig M. Shapiro  
Keogh Law, Ltd.  
101 North Wacker Drive, Suite 605  
Chicago, Illinois 60606  
(312) 726-1092 (telephone)  
(312) 726-1093 (facsimile)  
Keith@Keoghlaw.com  
ainat.margalit@gmail.com  
cshapiro@keoghlaw.com

Timothy J. Sostrin  
Legal Helpers, P.C.  
233 South Wacker Drive, Suite 5150  
Chicago, Illinois 60606  
(312) 753-7576 (telephone)  
(312) 822-1064 (facsimile)  
tjs@legalhelpers.com

*Attorneys for Plaintiffs Jeremy Frydman and Sam  
Marin, on their own behalf, and behalf of all others  
similarly situated*

Dated: January 27, 2012

By: s/ David C. Parisi

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

David C. Parisi (162248)  
Suzanne Havens Beckman (188814)  
PARISI & HAVENS LLP  
15233 Valleyheart Drive  
Sherman Oaks, California 91403  
(818) 990-1299 (telephone)  
(818) 501-7852 (facsimile)  
dcparsi@parisihavens.com  
shavens@parisihavens.com

Ethan Preston (263295)  
PRESTON LAW OFFICES  
21001 North Tatum Blvd., Suite 1630-430  
Phoenix, Arizona 85050  
(480) 269-9540 (telephone)  
(866) 509-1197 (facsimile)  
ep@eplaw.us

*Attorneys for Plaintiffs Jesse Meyer and Fred Jury,  
on their own behalf, and behalf of all others  
similarly situated*